

1 said.

2 Q. So you did call though?

3 A. I did.

4 Q. You did call. You said you have records that
5 show when you called?

6 A. No. You would have those records because it
7 was a City cell phone.

8 Q. Okay, so what time did you call?

9 A. I called as soon as I got to the parking lot
10 and got sick. Probably, I would say, roughly
11 7:50.

12 Q. Okay. We are talking about 7:50 is when the
13 phone call happened, and then there would be
14 10 to 15 minutes where you were collecting
15 yourself and speaking to Anthony.

16 A. Uh-huh.

17 Q. So it is going to be 8:05?

18 A. I would say about 8:10 I left to go home.

19 Q. How long did it take you to get home?

20 A. Maybe about 10 minutes.

21 Q. What did you do when you got home?

22 A. Took a shower, changed my clothes and came
23 back to work.

24 Q. How long did it take you to do everything?

25 A. I was back here, I would say, roughly 9:30,

1 9:36 at the latest.

2 Q. Let's focus while at home. How long were you
3 at your home before you left?

4 A. Enough to get a shower and change clothes. I
5 mean, I washed my hair and put it back in a
6 braid. I would say 20 minutes maybe, if that.

7 Q. Then did it take 10 or so minutes on the other
8 side to get back here?

9 A. Uh-huh.

10 Q. You are nodding again.

11 A. Oh, yes, I am sorry.

12 Q. And so did you call anybody else while you
13 were at home after or during the process of
14 cleaning yourself up?

15 A. Not that I can recall. There would not have
16 been any reason for me to. I had already left
17 several messages.

18 Q. Did you send any emails while you were at
19 home?

20 A. The only person that I believe I sent an email
21 to was Valerie.

22 Q. While you were at home?

23 A. No, no, in the parking lot.

24 Q. So you're at home cleaning yourself up. No
25 communication with anybody during that time?

1 A. Huh-huh.

2 Q. Just getting yourself ready and then heading
3 back to work?

4 A. Right.

5 Q. I would like to ask you about the car accident
6 on March 5 as well. You said there are some
7 tow records that are going to be coming.
8 Again, I am sorry that you had to go through
9 the accident. I am interested about when it
10 occurred though. Do you know what time of
11 day?

12 A. It was a snow -- we had a horrific snow storm
13 that morning. I was in a panic because -- let
14 me just say the roads were really bad. I
15 didn't have my truck. I had my car which was
16 a Lincoln, and it was a sled. I left to come
17 to work at my normal time, which was probably
18 about 7:20. I live off of -- anyway you come
19 -- I have to come down a hill. I can't get
20 past coming down a hill. Our streets are
21 never cleared.

22 So I slid into a person's front yard
23 and popped the side of the rim of my tire and
24 had to wait, just like a million other people
25 that morning were in the same situation.

1 9:36 at the latest.

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3 at your home before you left?

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22 So I slid into a person's front yard
23 and popped the side of the rim of my tire and
24 had to wait, just like a million other people
25 that morning were in the same situation.

1 the time keeper know, to keep track of their
2 time, to make sure they were still working on
3 -- we had a quarterly report that was going to
4 be due out. Just pretty making sure and going
5 over contracts that they were going to be
6 presenting in front of the board.

7 Q. In the course of the work that your -- that
8 you are performing, that you are describing at
9 this time, were you using your City email to
10 communicate with people?

11 A. For the most part. Well, more I would say my
12 staff contacted me personally but, yes, there
13 were emails.

14 Q. Did they contact you on the phone or did they
15 contact you --

16 A. Sometimes on the cell phone, sometimes on my
17 home phone.

18 Q. If I were to look through the City's email
19 records, I would see your City email address
20 being used to direct Kevin, Anthony --

21 A. And Victoria.

22 Q. I was trying to think about the timeline as to
23 me whether she was warned. I would see you
24 directing them to do certain tasks?

25 A. Yes. And there wasn't -- everybody knew their

1 Q. No, this is a question for you because the
2 letter is directed toward you. It says, you
3 are suspended five days pending termination.
4 Please tell the City what reasons you have why
5 you shouldn't be terminated.

6 A. I spoke to my attorney, and that should have
7 been handled through my attorney.

8 Q. Okay, you personally did not respond; is that
9 right?

10 MS. TUTTLE: Do you understand what
11 she is asking you about? Do you need it
12 clarified?

13 A. I believe so. I mean, maybe there is
14 something I am missing here.

15 Q. I will describe the process, and if you don't
16 understand what I am talking about, let me
17 know. There is a five day suspension pending
18 termination that was sent to you that says,
19 you are suspended five days pending
20 termination, please state the reasons why you
21 should not be discharged. You are given that
22 five day period to respond to the City and to
23 list whatever, you know, whatever reasons you
24 have to defend yourself against the charges.
25 We are not in possession of any response.

1 That indicates to me that there was no
2 response that you drafted. I am wondering if
3 you could explain to me your reasons for not
4 responding.

5 A. I believe that I turned everything over to my
6 attorneys. I don't -- because I already had
7 the lawsuit. So I believe everything was
8 turned over to my attorney for that response.
9 I am not -- I can't --

10 Q. Did you author a response yourself?

11 A. Offer from me?

12 Q. Author.

13 A. No. No, I didn't.

14 Q. Are you saying that's because you handed that
15 over to your attorney and expected them to do
16 it?

17 A. Yes. I believe so, yes.

18 Q. I think I just have one last question, and it
19 is about the fax that we already have, that
20 you so graciously brought again today. There
21 is this November 30 fax to the law department.

22 MS. TUTTLE: This was part of the
23 documents that you gave us that we gave to the
24 City.

25 Q. So I want to ask basically about this